

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

(1) REGINEL CAZARES a/k/a “Junior,”
(2) LUIS RAMON FELIZ SANTANA a/k/a
“Luis Felix” a/k/a “Michael Corleone,”
and
(3) CESAR PARRA a/k/a “Flow,”

Defendants

Cr. No. 24-10173-DJC

JOINT INTERIM STATUS REPORT

On June 13, 2024, a grand jury returned an indictment charging defendants Cazares, Feliz Santana, and Lopez Medina with one count of Conspiracy to Distribute and to Possess with Intent to Distribute Controlled Substances, in violation of 21 U.S.C. § 846 (Count One); and charging all defendants with Money Laundering Conspiracy, in violation of 18 U.S.C. § 1956(h) (Count Two). Defendants Feliz Santana and Lopez Medina are detained. Defendants Cazares and Parra are released on conditions.

On December 18, 2024, Lopez Medina pleaded guilty and is awaiting sentencing.

Pursuant to Local Rule 116.5(b), the parties submit the following joint status report.

1. Automatic Discovery and Discovery Requests

The government provided initial automatic discovery on July 25, 2024. The government provided additional discovery on August 13, 2024, and November 18, 2024.

Counsel for defendant Reginel Cazares seeks one additional 30-to-45-day period to review discovery. Counsel for defendants Felix and Parra acquiesce in that request but have not, themselves, requested additional time.

2. Timing of Additional Discovery

The government will provide any additional exculpatory information as provided by the Local Rules.

3. Timing of Additional Discovery Requests

Defendants reserve the right to make discovery requests upon complete review of discovery produced to-date.

4. Protective Orders

No party has filed for a motion for a protective order.

5. Pretrial Motions

The defendants have not filed any pretrial motions under Fed. R. Crim. P. 12(b). They reserve the right to file after complete review of discovery.

6. Timing of Expert Disclosures

The Court has not yet established a date for expert witness disclosures. The government will provide expert disclosures as required by Rule 16.

7. Defenses

The defendants need additional time to review discovery before deciding whether they intend to raise any affirmative defenses to the present charges.

8. Excludable Delay

Zero days of non-excludable time have accrued and 70 days will remain under the Act in which the case must be tried.

9. Plea Discussions, Trial

The parties have engaged in some plea negotiations. Any trial is anticipated to last 6-7 days.

10. Timing of Interim Status Conference

The Court may wish to cancel the status conference scheduled for January 6, 2025, in light of the information in this report, and schedule a final status conference for 30-45 days from January 6, 2025. The parties jointly request that any Speedy Trial Act time be excluded from January 6, 2025, until any further status conference that the Court schedules.

Respectfully submitted,

JOSHUA S. LEVY
United States Attorney

By: /s/ Samuel R. Feldman
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CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants .

/s/ Samuel R. Feldman

Samuel R. Feldman

Assistant United States Attorney

Date: December 31, 2024